

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 89-179

AMENDING NPDES PERMITS FOR THE TWENTY-EIGHT DISCHARGERS CITED:

City of Benicia, City of Burlingame, Central Contra Costa County Sanitary District, Central Marin Sanitation Agency, Delta Diablo Sanitation District, Dublin-San Ramon Services District, East Bay Municipal Utility District (Special District #1), Fairfield-Suisun Sewer District, City of Hayward, City of Livermore, City of Millbrae, Napa Sanitation District, North San Mateo County Sanitation District, Novato Sanitary District, Oro Loma Sanitary District, City of Palo Alto, City of Petaluma, City of Richmond, City and County of San Francisco (Northpoint Plant, Southeast Plant and Richmond Sunset Plant), Cities of San Jose and Santa Clara, City of San Leandro, City of San Mateo, South Bayside System Authority, Cities of South San Francisco and San Bruno, City of Sunnyvale, Union Sanitary District, Vallejo Sanitation and Flood Control District, and West Contra Costa Sanitary District

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Board), finds that:

1. The Publicly Owned Treatment Works (POTW) listed below (hereinafter the Dischargers) have been previously issued National Pollutant Discharge Elimination System (NPDES) Permits in Board Orders given below:

<u>PERMIT NO.</u>	<u>NPDES ORDER NO.</u>	<u>ISSUED</u>	<u>DATE</u>
Benicia, City of	CA0038091	88-005	1/20/88
Burlingame, City of	CA0037788	85-82	6/19/85
Central Contra Costa County Sanitary District	CA0037648	84-77	10/17/84
Central Marin Sanitation Agency	CA0038628	85-118	10/16/85
Delta Diablo Sanitation District	CA0038547	88-030	3/16/88
Dublin-San Ramon Services Dist.	CA0037613	89-099	6/21/89
East Bay Municipal Utility Dist., Special Dist. #1	CA0037702	89-149	9/20/89
Fairfield-Suisun Sewer District	CA0038024	85-53	5/15/85
Hayward, City of	CA0037869	89-098	6/21/89
Livermore, City of	CA0038008	89-100	6/21/89

Millbrae, City of	CA0037532	89-003	1/18/89
Napa Sanitation District	CA0037575	88-094	6/15/88
North San Mateo County Sanitation District	CA0037737	89-147	9/20/89
Novato Sanitary District	CA0037958	85-32	4/30/85
Oro Loma Sanitary District	CA0037869	89-098	6/21/89
Palo Alto, City of	CA0037834	88-175	12/21/88
Petaluma, City of	CA0037810	85-14	2/20/85
Richmond, City of	CA0038539	88-071	5/18/88
San Francisco, City and County of:			
Northpoint Plant	CA0037672	89-119	7/19/89
Southeast Plant	CA0037664	89-101	6/21/89
Richmond Sunset Plant	CA0037681	88-106	6/15/88
San Jose and Santa Clara, Cities of	CA0037842	89-012	1/18/89
San Leandro, City of	CA0037869	89-098	6/21/89
San Mateo, City of	CA0037541	84-69	10/17/84
South Bayside System Authority	CA0038369	88-070	5/18/88
South San Francisco and San Bruno, Cities of	CA0038130	87-026	4/15/87
Sunnyvale, City of	CA0037621	88-176	12/21/88
Union Sanitary District	CA0037869	89-098	6/21/89
Vallejo Sanitation and Flood Control District	CA0037699	88-153	10/19/88
West Contra Costa Sanitary Dist.	CA0038539	88-071	5/18/88

2. The U.S. Environmental Protection Agency (EPA) has promulgated regulations requiring publicly-owned treatment works (POTW) which meet one of several criteria to develop and implement local pretreatment programs. These criteria are as follows:

- * POTWs with total design flows greater than 5 million gallons per day (mgd) and receive from Industrial Users pollutants which Pass Through or Interfere with the operation of the POTW;
- * POTWs with smaller flows (5 mgd or less) which receive industrial waste which may interfere with treatment processes, contaminate sludge, cause violation of effluent limitations, or other circumstances which may cause Interference with the POTW or cause Pass Through of pollutants or cause POTW upsets.

3. The EPA formally delegated the Pretreatment Program to the State Water Resources Control Board (State Board) and the Regional Water Quality Control Boards on September 22, 1989. As of September 22, 1989, the Board is the Approval Authority and will be responsible for the review and approval of new and modified POTW Pretreatment Programs.
4. The Board adopted Order No. 84-60 on September 19, 1984. The Order required the cited POTWs to implement pretreatment programs in accordance with 40 CFR Part 403.
5. On June 17, 1983, the Sewerage Agency of Southern Marin's (SASM) Pretreatment Program received final approval by the EPA. By letter dated September 22, 1989, SASM requested that its Pretreatment Program be removed from the Federal Pretreatment Program requirements.
6. SASM does not meet any of the criteria for requiring a pretreatment program. (See Finding 2.) The plant's design capacity is currently 2.9 mgd. There is no industrial discharge in the SASM service area, and it is not expected that any industrial discharger will ever move into SASM's service area due to the nature of the General Plans and zoning ordinances that govern land use in the service area.
7. Based on Findings 5 & 6, the SASM no longer meets the criteria required to develop and implement a pretreatment program. Therefore, the Sewerage Agency of Southern Marin has been deleted from this Order as having an Approved Pretreatment Program.
8. The Board has notified the Dischargers and interested agencies and persons of its intent to amend the NPDES Permits and has provided them with an opportunity for a public hearing and to submit their written views and recommendations.
9. This Project is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code (California Environmental Quality Act) pursuant to Section 13389 of the California Water Code.
10. The Board, in a public meeting, heard and considered all comments pertaining to the discharges.

IT IS HEREBY ORDERED, pursuant to the provisions of Division 7 of the California Water Code and regulations adopted thereunder, and to the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, that the Dischargers listed in Finding 1 shall comply with the following:

1. The Dischargers shall implement all pretreatment requirements contained in 40 CFR Part 403, as amended. The Dischargers shall be subject to enforcement actions, penalties, and fines as provided in the Clean Water Act (33 USC 1351 et seq.), as amended. The Discharger shall implement and enforce its Approved Pretreatment Program or modified Pretreatment Program as directed by the Board's Executive Officer or the EPA. EPA and/or the State may initiate enforcement action against an industrial user for noncompliance with applicable standards and requirements as provided in the Clean Water Act.
2. The Dischargers shall enforce the requirements promulgated under sections 307(b), 307(c), 307(d), 307(e) and 402(b) of the Clean Water Act. The Dischargers shall cause industrial users subject to Federal Categorical Standards to achieve compliance no later than the date specified in those requirements or, in the case of a new industrial user, upon commencement of the Discharge.
3. The Dischargers shall perform the pretreatment functions as required in 40 CFR Part 403 and amendments or modifications thereto including, but not limited to:
 - (1) Implement the necessary legal authorities to fully implement the pretreatment regulations as provided in 40 CFR 403.8(f)(1);
 - (2) Implement the programmatic functions as provided in 40 CFR 403.8(f)(2);
 - (3) Publish an annual list of industrial users in significant violation and/or in significant noncompliance as provided per 40 CFR 403.8(f)(2)(vii).
 - (4) Provide the requisite funding and personnel to implement the pretreatment program as provided in 40 CFR 403(f)(3); and
 - (5) Enforce the national pretreatment standards for prohibited discharges and categorical standards as provided in 40 CFR 403.5 and 403.6, respectively.
4. The Dischargers shall submit annually a report to EPA Region 9, the State Board and the Board describing the Dischargers' pretreatment program activities over the previous twelve months. In the event that the Discharger is not in compliance with any conditions or requirements of this permit, the Discharger shall also include the reasons for non-compliance, and a plan and schedule for achieving compliance. The report shall contain, but not be limited to,

the information specified in the Appendix A entitled "Requirements for Pretreatment Annual Report", which is made a part of this Order. The annual report is due on the last day of February each year. For the 1989 annual report, the submittal due date is March 30, 1990. The Executive Officer may specify another due date on a case by case basis.

5. The Dischargers shall submit quarterly reports to the EPA Region 9, the State Board and the Board describing the compliance status of their significant industrial users (SIUs). (See Appendix A, page 3 for definition of SIU.) The report shall contain, but not be limited to, the information specified in Appendix B entitled "Requirements for Pretreatment Quarterly Reports", which is made a part of this Order. The quarterly reports are due on April 30 (1st quarter), July 30 (2nd quarter), October 30 (3rd quarter), and January 30 (4th quarter) each year. The Executive Officer may exempt a Discharger from the quarterly report requirement on a case by case basis subject to State Board and EPA's comment and approval.
6. The Dischargers shall conduct semi-annual/quarterly monitoring of the treatment plants' influent, effluent, and sludge in accordance with the directions given in Appendix C entitled "Requirements for Influent, Effluent, and Sludge Monitoring", which is made a part of this Order. The results of the sampling and analysis, including the analytical laboratory reports and the data validation (see Appendix C, Section I.D. and Section II.B.), shall be submitted in the 1st and 3rd quarterly reports. A summary of the data shall be included in the annual report. The Executive Officer may require more or less frequent monitoring on a case by case basis.
7. Order No. 84-60 is hereby rescinded.
8. This Order shall serve to amend the National Pollutant Discharge Elimination System Permits listed above pursuant to Section 402 of the Clean Water Act, or amendments thereto, and shall become effective 10 days after date of its adoption provided the Regional Administrator, Environmental Protection Agency, has no objection. If the Regional Administrator objects to its issuance, this Order shall not become effective until such objection is withdrawn.
9. This Order expires on December 13, 1994.

I, Steven R. Ritchie, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on December 13, 1989.



Steven R. Ritchie
Executive Officer

Appendices:

- A: Requirements for Pretreatment Annual Reports
- B: Requirements for Pretreatment Quarterly Reports
- C: Requirements for Influent, Effluent, and Sludge Monitoring

APPENDIX A

REQUIREMENTS FOR PRETREATMENT ANNUAL REPORTS

The Pretreatment Annual Report is due each year on the last day of February. The report shall contain at a minimum, but not limited to, the following information: (Refer to the Quarterly and Annual Report Pretreatment Report Guidance Package prepared by the Regional Board in January 1986, and future revision thereof, for information on the report format.)

The purpose of the Annual Report is two-fold. It is to describe the status of the Publicly Owned Treatment Works (POTW) pretreatment program and to report on the effectiveness of the program, as given by the results of the preceding years program implementation.

1) Cover Sheet

The cover sheet must contain the name(s) and National Pollutant Discharge Elimination System (NPDES) permit number(s) of those plants which are served under the District's Pretreatment Program. Additionally, the cover sheet must include: the name, address, and phone number of a pretreatment contact person; the period covered in the report; the period covered in the previous report; a statement of truthfulness; and the dated signature of a principal executive officer, ranking elected official, or other duly authorized employee who is responsible for overall operation of the POTW (40 CFR 403.12(j)).

2) Introduction

The Introduction shall include any pertinent background information related to the District, the POTW, and/or the Industrial base of the area. Also, this section shall include an update on the status of any Pretreatment Compliance Inspection (PCI) tasks, Pretreatment Audit tasks, or Cleanup and Abatement Order (CAO) tasks required by the Regional Board or EPA. A more specific discussion will be included in the chapter entitled, "Program Changes." With each of the program elements, there shall also be a brief discussion comparing and contrasting the current status with that described in the Discharger's EPA or Regional Board Approved Program.

3) Definitions

This section shall contain a list of all the terms and their definitions which the POTW uses to describe or characterize elements of the pretreatment program. This shall include

the definition of either "Significant Violation" or "Significant Noncompliance," whichever the POTW utilizes in determining an Industrial User's (IU) compliance status.

4) Discussion of Upset, Interference and Pass-through

This section shall include a discussion of Upset, Interference, or Pass-through incidents, if any, at the POTW treatment plant(s) which the Discharger knows of or suspects were caused by industrial discharges. Each incident shall be described with the minimum of the following information:

- a) a description of what occurred
- b) a description of what was done to identify the source
- c) the name and address of the IU responsible
- d) the reason(s) why the incident occurred
- e) a description of the corrective actions taken
- f) an examination of the local and federal discharge limits and requirements for the purpose of determining whether any additional limits or changes to existing requirements may be necessary to prevent other Upset, Interference, or Pass through incidents.

5) Influent, Effluent and Sludge Monitoring Results

This section shall provide a summary of the analytical results from the "Influent, Effluent and Sludge Monitoring" as specified in Appendix C. The analytical laboratory reports are not required if they have already been provided in the 1st and 3rd quarterly reports.

6) Inspection and Sampling Program

This section shall contain at a minimum, but is not limited to, the following information:

- a) Inspections: the number of inspections performed for each type of IU; the criteria for determining the frequency of inspections; the inspection format followed by the Industrial Waste Inspector.
- b) Sampling Visits: the number of sampling visits performed for each type of IU; the criteria for determining the frequency of sampling; the chain of custody procedures.

7) Enforcement Procedures

This section shall include a narrative discussion of the District's enforcement procedures: the type of enforcement action to be taken after each type of violation (including

late reports), the number of lapsed days allowed before escalating enforcement actions and the persons/agencies involved in each level of enforcement. Also to be included is an enforcement flow chart, or some similar inclusive enforcement plan.

8) **Federal Categorical/Local Standards**

This section shall contain a list of all of the federal categories which apply to the District. The maximum and average limits for each category must be listed as must any additional or more stringent local limits. This list shall indicate the number of Categorical Industrial Users (CIUs) per category.

9) **Updated List of Regulated IUs**

This section shall contain a complete and updated list of the Discharger's Significant Industrial Users (SIUs), including their names and addresses. The list shall include all deletions and additions keyed to the list submitted in the previous annual report.

a) **Organization:** The list of IUs shall be organized in the following manner:

- (1) Those IUs regulated by Federal categorical standards shall be listed by the category under which they fall.
- (2) Those IUs that are classified as Significant non-categorical industries as defined in EPA's Pretreatment Compliance Monitoring and Enforcement Guidance document shall be listed separately.

b) **Inspection and Sampling Summary:** This section shall contain a summary of all the inspections and sampling activities conducted by the Discharger over the past year to gather information and data regarding IUs including the IUs for which a combined waste stream formula was applied to determine the appropriate limits. The summary shall include:

- (1) the number of inspections and sampling events conducted for each IU;
- (2) the quarters in which these activities were conducted; and
- (3) the compliance status of each IU, delineated by quarter, and characterized using all applicable descriptions as given below:

- (a) in consistent compliance;
 - (b) in inconsistent compliance;
 - (c) in significant violation (as defined in 40 CFR 403.8(f)(2)(vii);
- or
- (d) in significant noncompliance (as defined in "The Enforcement and Monitoring Guidance" document published by the EPA in Pretreatment Compliance Monitoring and Enforcement Guidance, Sept. 1986, page 3-52.
 - (e) on a compliance schedule to achieve compliance, (include the date final compliance is required);
 - (f) not in compliance and not on a compliance schedule;
 - (g) compliance status unknown, and why not.
- c) Enforcement Summary:** This section shall contain a summary of the compliance and enforcement activities during the past year. The summary shall include the names of all the IUs affected by the following actions:
- (1) Warning letters or notices of violations regarding IUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local standard/limit or requirement.
 - (2) Administrative Orders regarding the IUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local standard/limit or requirement.
 - (3) Civil actions regarding the IUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an

infraction of a federal or local standard/limit or requirement.

- (4) Criminal actions regarding the IUs' apparent noncompliance with or violation of any federal pretreatment categorical standards and/or requirements, or local limits and/or requirements. For each notice, indicate whether it was for an infraction of a federal or local standard/limit or requirement.
- (5) Assessment of monetary penalties. Identify the amount of penalty in each case and the reason for assessing the penalty.
- (6) Order to restrict/suspend discharge to the POTW.
- (7) Order to disconnect the discharge from the POTW.

10) Baseline Monitoring Report Summary

This section shall have a cumulative list of CIUs and their respective Baseline Monitoring Report (BMR) status. The BMR must contain all the information specified in 40 CFR 403.12(b). For each CIU, the summary shall indicate when the BMR was due pursuant to pretreatment regulations; when the CIU was notified by the POTW of this requirement (if appropriate); when the CIU submitted the report; and/or when the report is due, in the case of new dischargers.

11) Pretreatment Program Changes

This section shall contain a description of any significant changes in the Pretreatment Program during the past year including, but not limited to: legal authority, local limits, monitoring/inspection program and frequency, enforcement protocol, program's administrative structure, staffing level, resource requirements, and funding mechanism. If any element(s) of the program is in the process of being modified, this shall also be indicated.

12) Pretreatment Program Budget

This section shall present the budget spent on the Pretreatment Program. The budget shall show the amounts spent on personnel, equipment, chemical analyses, and any other appropriate categories. A discussion of the source(s) of funding shall be included. Also, the year's budget shall be compared and contrasted to the prior year's budget and to the projected year's budget for the following year. An

updated pretreatment equipment inventory shall also be included.

13) **Public Participation Summary**

This section shall include a copy of the public notice as required in 40 CFR 403.8(f)(2)(vii). If a notice was not published, the reason shall be stated.

If any workshop or other event was conducted regarding the pretreatment program to inform or involve the public, it shall be briefly described in this section.

14) **Sludge Storage and Disposal Practices**

This section shall have a description of how the treated sludge is stored and ultimately disposed. The sludge storage area, if one is used, shall be described in detail. Its location, a description of the containment features, and the sludge handling procedures shall be included.

15) **Other Subjects**

Other information related to the Pretreatment Program which does not fit into one of the above categories shall be included in this section.

Signed copies of the reports shall be submitted to the Regional Administrator at EPA, the State Water Resources Control Board, and the Regional Board at the following addresses:

Regional Administrator
U.S. Environmental Protection Agency
Region 9, Mail Code W-5-1
215 Fremont Street
San Francisco, CA 94105

Pretreatment Program Manager
Regulatory Section
Division of Water Quality
State Water Resources Control Board
P.O. Box 944213
Sacramento CA 94244-2130

Pretreatment Coordinator
Surface Water Protection Division
Regional Water Quality Control Board
1800 Harrison Street, Suite 700
Oakland, CA 94612

APPENDIX B:

REQUIREMENTS FOR PRETREATMENT QUARTERLY REPORTS

The quarterly reports are due on April 30 (1st quarter), July 30 (2nd quarter), October 30 (3rd quarter), and January 30 (4th quarter) each year, unless an exception has been granted by the Board's Executive Officer. The report shall contain at a minimum, but is not limited to, the following information: (Refer to the Quarterly and Annual Report Pretreatment Report Guidance Package prepared by Regional Board in January 1986, and future revisions thereof, for information on report format.)

1. Influent, Effluent and Sludge Monitoring Results

The semi-annual influent, effluent and sludge monitoring results shall be included in the 1st (wet season) and 3rd (dry season) quarter reports, unless otherwise notified. The analytical laboratory report and the data validation data (see Appendix C, Section I.D) must be included. A description of the sampling procedures and a discussion of the results shall be given. (Please see Appendix C for specific detailed requirements.) The source(s) of parameters which exceed National Pollutant Discharge Elimination System (NPDES) limits shall be investigated and discussed. In addition, a brief discussion of the source(s) of all organic compounds identified shall be provided.

2. Industrial User Compliance Status

This section shall contain a list of all Significant Industrial Users (SIUs) which were not in consistent compliance with all pretreatment standards/limits or requirements for the quarter. The compliance status for the previous three quarters shall also be included. Noncompliance status includes incidents of failure to submit reports. Once an IU is in consistent compliance for a total of six months or two quarters, the IU shall no longer be included on the list.

For each IU on the list, the following information shall be provided:

- a. Indicate if the IU is subject to Federal categorical standards; if so, which category.

- b. For IUs subject to Federal Categorical Standards, indicate which parameters applied to the IU are local limits more stringent than the Federal Categorical Standards.
- c. Indicate the compliance status of the IU for the quarter and each of the previous three quarters.
- d. For violations/noncompliance occurring in the current quarter, list (1) the date(s) of the violation; (2) the nature of the violation, and (3) the parameters and corresponding concentrations exceeding limits, and the discharge limits for these parameters (if applicable).

3. **POTW's Compliance with Pretreatment Program Requirements**

This section shall contain a discussion of the Discharger's compliance status with the Pretreatment Program Requirements as indicated in the latest Pretreatment Audit Report or Pretreatment Compliance Inspection (PCI) Report. It shall contain a summary of the following information:

- a. Date of the latest Audit or PCI and report.
- b. Date of the Discharger's response.
- c. List of unresolved issues.
- d. Plan and schedule for resolving the remaining issues.

If none of the three sections described above are applicable for the quarter, at a minimum, the Discharger shall submit a letter stating that (1) all the IUs are and have been in compliance for the previous six months or two quarters, and (2) there are no outstanding program deficiencies as identified in the last audit or PCI report.

The reports shall be signed by a principal executive officer, ranking elected official, or other duly authorized employee who is responsible for overall operation of the Publicly Owned Treatment Works (POTW) (40 CFR 403.12(j)). Signed copies of the reports shall be submitted to the Regional Administrator at EPA, the State Water Resources Control Board, and the Regional Board at the following addresses:

Regional Administrator
U.S. Environmental Protection Agency
Region 9, Mail Code W-5-1
215 Fremont Street
San Francisco, CA 94105

Pretreatment Program Manager
Regulatory Section
Division of Water Quality
State Water Resources Control Board
P.O. Box 944213
Sacramento CA 94244-2130

Pretreatment Coordinator
Surface Water Protection Division
Regional Water Quality Control Board
1800 Harrison Street, Suite 700
Oakland, CA 94612

APPENDIX C

REQUIREMENTS FOR INFLUENT, EFFLUENT, AND SLUDGE MONITORING

The Dischargers shall conduct sampling of the treatment plants' influent, effluent, and sludge on the frequency basis dictated in the March 26, 1986 (3/26/86) Regional Board letter entitled, **"Pretreatment Monitoring Requirements for Influent and Effluent,"** and addressed to the individual POTWs. The prescribed frequencies are reproduced in Table 1 on Page 6.

The monitoring and reporting requirements of the POTWs' Pretreatment Program are in addition to those specified in the individual POTW's NPDES permit. Any subsequent amendments or modifications of the NPDES requirements, including the August 28, 1989 Regional Board letter updating the Discharger's monitoring frequency requirements for Table 4-1 Pollutants, shall be adhered to and shall not affect the requirements described in this Appendix unless written notice from the Regional Board is received. When sampling periods coincide, one set of test results, reported separately, may be used for those parameters which are required to be monitored in both the Discharger's NPDES permit and Pretreatment Program. Monitoring reports required by this Order shall be sent to the Pretreatment Coordinator. Monitoring shall be conducted as follows:

I. Influent and Effluent Monitoring

The Dischargers shall monitor for the parameters specified in the above referenced 3/26/86 Regional Board letter, using the required test methods stated therein, and reproduced in Table 1. EPA Test Methods 1624 and 1625 may be substituted for EPA Methods 624 and 625 respectively. EPA Test Method 1618 may be used for the analysis of the EPA Method 614 parameters. Any other test method substitutions must be met with written prior Regional Board approval. Unless instructed otherwise in writing, the Dischargers shall continue to monitor for those parameters. Influent and Effluent sampling locations shall be the same as those sites specified in the POTWs' Self Monitoring Programs as set forth in their individual NPDES permits.

The influent and effluent samples shall be taken during the same 24-hour period. All samples must be representative of daily operations. A minimum of four grab samples, one every six hours over a 24-hour period, must be used for Volatile Organic Compounds (EPA Method 624), cyanide, and total phenols. These samples shall be composited at the analytical laboratory just prior to analysis. For all other pollutants, 24-hour composite samples must be obtained through flow-proportioned composite sampling.

Sampling and analysis shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto. In tests for Volatile Organic Compounds and Base/Neutral and Acid Extractable Organic Compounds non-priority pollutant peaks detected at or above 10 ug/l, based on the nearest internal standard, shall be identified and quantified (based on a purity of 80% or best fit value) and included in the test results. Detection limits required in the 3/26/86 Regional Board letters, and as listed in the attached Table 2 (page 7), shall be adhered to.

The following standardized report form, identical in content to that contained in the 1986 Pretreatment Quarterly and Annual Report Guidance Packet, should be used for submittal of the influent and effluent monitoring report. A similarly structured form may be used but will be subject to Regional Board approval. The monitoring reports should be sent with the regular Quarterly Pretreatment Program reports. Semi-annual monitoring shall be submitted with the 1st and 3rd Quarterly Reports.

- A. Sampling Procedures - This shall include a brief discussion of the sample locations, collection times, how the sample was collected (i.e. direct collection using vials or bottles, or other types of collection using devices such as automatic samplers, buckets, or beakers), types of containers used, storage procedures, and holding times. Include a description of prechlorination and chlorination/dechlorination practices during the sampling periods.
- B. Method of Sample Dechlorination - A brief description of the sample dechlorination method prior to analysis shall be provided.
- C. Sample Compositing - The manner in which samples are composited shall be described. If the compositing procedure is different from the test method specifications, a reason for the variation shall be provided.
- D. Data Validation - All quality assurance/quality control (QA/QC) methods to be used shall be discussed and summarized. These methods include, but are not limited to, spike samples, split samples, blanks, and standards. Ways in which the QA/QC data will be used to qualify the analytical test results shall be identified. A certification statement shall be submitted with this discussion stating that the laboratory QA/QC validation data has been reviewed and has met the laboratory acceptance criteria. The QA/QC validation data shall be submitted to the Regional

Board upon request.

- E. A tabulation of the test results, including the appropriate detection limits, shall be completed on the forms provided in the Pretreatment Quarterly and Annual Report Guidance Packet. Additional detection limit columns shall be included as necessary.
- F. Discussion of Results - The report shall include a complete discussion of the test results. If any pollutant is detected in sufficient concentration to upset, interfere, or pass-through plant operations, the type of pollutant(s) and potential source(s) shall be noted, along with a plan of action to control, eliminate, and/or monitor the pollutant(s). The discussion shall also include a list of pollutants suspected in the influent based on review of the industrial waste sources, and the possible reasons for the absence of those pollutants in the influent and/or effluent. Any apparent generation and/or destruction of pollutants attributable to chlorination/dechlorination sampling and analysis practices shall be noted.

II. Sludge Monitoring

Sludge shall be sampled in the same 24-hour period during which the influent and effluent are sampled except as noted in (3) below. The same parameters required for influent and effluent analysis shall be included in the sludge analysis. The sludge analyzed shall be a composite sample of the sludge for final disposal consisting of:

- 1. Sludge lagoons - 20 grab samples collected at representative equidistant intervals (grid pattern) and composited as a single sample, or
- 2. Dried stockpile - 20 grab samples collected at various representative locations and depths and composited as a single sample, or
- 3. Dewatered sludge - daily composite of 4 representative grab samples each day for 5 days taken at equal intervals during the daily operating shift taken from a) the dewatering units or b) from each truckload, and shall be combined into a single 5-day composite.

The EPA manual Sampling Procedures and Protocols for the National Sewage Sludge Survey, March 1988, containing detailed sampling protocols specific to sludge, is recommended as a guidance for sampling procedures.

Required sludge analysis methods for those parameters not listed under Title 22 Section 66699 are the same as those required for influent and effluent testing. The use of EPA Methods 1624 and 1625 in lieu of EPA Methods 624 and 625 is acceptable and is recommended. EPA Test Method 1618 may be used for the analysis of EPA 614 parameters. The EPA manual Analytical Methods of the National Sewage Sludge Survey, March 1988, containing detailed analytical protocols specific to sludge, is recommended as a guidance for analysis methods. The analysis method for substances listed under Title 22 Section 66699, which includes metals, must be one approved by both the EPA and California Department of Health. Analysis methods described in Analytical Methods of the National Sewage Survey are recommended. Detection limits shall be as low as is achievable with reasonable interference levels. Cleanup procedures shall be employed as necessary. In accordance with Title 22 Section 66700 the Waste Extraction Test (WET), or other subsequently approved extraction method, shall be used if the total concentration of a metal parameter, or other parameters required for monitoring and listed, or subsequently listed, in Section 66699, is above the Soluble Threshold Limit (STLC) and below the Total Threshold Limit (TTLC) for that parameter. Should the concentration (in mg/l) of a Section 66699 parameter exceed the STLC value using the WET procedure, or should the total concentration (in mg/kg) of such a parameter exceed its TTLC value, the sludge shall be classified as a hazardous waste under Title 22 of the California Code of Regulations and shall be treated as such. Title 22 Sections 66693 to 66699 and all amendments thereto must be adhered to.

Sludge monitoring reports shall be submitted with the 1st and 3rd Quarterly Pretreatment Program Reports. The following standardized report form, identical in content to that contained in the 1986 Pretreatment Quarterly and Annual Report Guidance Packet, should be used for submittal of the sludge monitoring report. A similarly structured form may be used but will be subject to Regional Board approval.

- A. Sampling Procedures - Include sample locations, collection procedures, types of containers used, storage/refrigeration methods, compositing techniques, and holding times. Enclose a map of sample locations if sludge lagoons or stockpiled sludge is sampled.
- B. Data Validation - All quality assurance/quality control (QA/QC) methods to be used shall be discussed and summarized. These methods include, but are not limited to, spike samples, split samples, blanks, and standards. Ways in which the QA/QC data will be used to qualify the analytical test results shall be

identified. A certification statement shall be submitted with this discussion stating that the laboratory QA/QC validation data has been reviewed and has met the laboratory acceptance criteria. The QA/QC validation data shall be submitted to the Regional Board upon request.

- C. Test Results - Include tabulation of test results using the format indicated in the Report Guidance Packet. Detection limits and Total Threshold Limit Concentration (TTLC) levels in mg/kg must be included.
- D. Discussion of Results - The report shall include a complete discussion of test results. If the detected pollutant(s) is reasonably deemed to have an adverse effect on sludge disposal, a plan of action to control, eliminate, and/or monitor the pollutant(s) and the known or potential source(s) shall be included. The discussion shall also include a list of pollutants suspected in the influent based on review of the industrial waste sources, and the possible reasons for the absence of those pollutants in the sludge. Any apparent generation and/or destruction of pollutants attributable to chlorination/ dechlorination sampling and analysis practices shall be noted.

The Discharger shall also provide any influent, effluent, or sludge monitoring data for nonpriority pollutants which the permittee believes may be causing or contributing to Interference, Pass Through, or adversely impacting sludge quality.

TABLE 1: Required Monitoring Frequencies and Test Methods for POTWs With Pretreatment Programs

POTW	Influent and Effluent					Sludge
	V.O.	BNA	O-Pest.	C-Pest.	Metals	
	EPA 624	EPA 625	EPA 614	EPA 632	AA*	
Benicia	Q	Q	SA	SA	Q	SA
Burlingame	SA	SA			SA	SA
CCCSD	Q	Q	Q	Q	Q	SA
CMSA	SA	SA			SA	SA
Delta Diablo	SA	SA			SA	SA
Dublin-S.R.	SA	SA			SA	SA
East Bay MUD	Q	Q			Q	SA
Fairfield-Suisun	SA	SA			SA	SA
Hayward	SA	SA			SA	SA
Livermore	SA	SA			SA	SA
Millbrae	SA	SA			SA	SA
Napa	SA	SA	SA	SA	SA	SA
N.S.M.CSD	A**	A**			A**	A**
Novato	SA	SA			SA	A**
Oro Loma	SA	SA			SA	SA
Palo Alto	SA	SA			SA	SA
Petaluma	SA	SA		SA	SA	SA
Richmond	SA	SA			SA	SA***
S.F.C.C.	Q	Q			Q	SA
San Jose	SA	SA			SA	SA
San Leandro	Q	Q			Q	SA
San Mateo	SA	SA			SA	SA
S.B.S.A.	Q	Q			Q	SA
S.S.F. & San Bruno	SA	SA			SA	SA
Sunnyvale	SA	SA			SA	SA
Union SD	Q	Q			Q	SA
Vallejo	SA	SA			SA	SA
W.C.C.S.D.	SA	SA	SA	SA	SA	A**

* Approved Analytical methods from CFR 40 Part 136 except as provided under the Sludge Monitoring section of this document.

** 3rd Quarter (Dry Season) Only. For W.C.C.S.D., two sludge samples are to be taken: one on the sludge prior to mixing with Richmond's sludge and one on the combined sludge from Richmond and W.C.C.S.D.

*** The sludge sampling shall be performed on Richmond's sludge prior to mixing with W.C.C.S.D.'s sludge.

Q = quarterly sampling

SA = semi-annual sampling

TABLE 2: Required Detection Limits for Influent and Effluent

Parameter	Test Method	Detection Limit*
Volatile Organic Compounds	EPA 624	1 ug/l
Base/Neutral and Acid Extractable Organic Compounds	EPA 625	1 ug/l
Organophosphorus Pesticides	EPA 614	0.1 ug/l
Carbamate and Urea Pesticides	EPA 632	0.1 ug/l
Trace Metals (Arsenic, Cadmium, EPA approved Total Chromium, Copper, Lead, Mercury, Nickel, Zinc, Selenium		As stated in Discharger's Self- Monitoring Program
* EPA method detection limits for some organic compounds and pesticides may be higher than listed. The detection limits (ug/l) for these compounds and pesticides shall be determined by the stated detection limits in the appropriate test method.		